

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE VASO ACTIVE PHARMACEUTICALS)
SECURITIES LITIGATION)

Master File No. 04-CV-10708-RCL

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Local Rule 83.5.3(b) and on behalf of the defendants Vaso Active Pharmaceuticals, Inc., John J. Masiz, and Joseph Frattaroli, I, Michael G. Bongiorno, move for the admission *pro hac vice* of Jay Holtmeier and state as follows:

1. I am a member of the bar of this Court in good standing.
2. Jay Holtmeier graduated from Cornell Law School in 1990 and was admitted to the practice of law in the State of New York in 1992. Mr. Holtmeier also is admitted to practice in the United States District Courts for the Southern District of New York and the Eastern District of New York.
3. Mr. Holtmeier is a member of the bar in good standing in every jurisdiction where he has been admitted.
4. There are no disciplinary proceedings against Mr. Holtmeier, and he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, the defendants respectfully request that Jay Holtmeier of Wilmer Cutler Pickering Hale and Dorr LLP, 399 Park Avenue, New York, New York 10022, be admitted to

practice before this Court for all purposes in connection with the representation of Vaso Active Pharmaceuticals, Inc., John J. Masiz, and Joseph Frattaroli in this proceeding.

Respectfully submitted,

VASO ACTIVE PHARMACEUTICALS,
INC., JOHN J. MASIZ, AND JOSEPH
FRATTAROLI,

By their attorneys,

/s/ Michael G. Bongiorno
Jeffrey B. Rudman (BBO# 433380)
Michael G. Bongiorno (BBO #558748)
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Dated: December 3, 2004